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FILED IN THE
U.S. DISTRICT COURT
EASTERN DISTRICT OF WASHINGTON

4/14/21

SEAN F. MCAVOY, CLERK

UNITED STATES DISTRICT COURT
FOR THE EASTERN DISTRICT OF WASHINGTON

UNITED STATES OF AMERICA,

Plaintiff,

v.

JASMINE MARIE CAMPBELL (a/k/a
"Lucas")

Defendants.

No. 4:21-CR-6008-SMJ

SUPERSEDING INDICTMENT

Vio: 21 U.S.C. §§ 841(a)(1),
(b)(1)(A)(vi), (viii), 846
Conspiracy to Distribute 400
grams or more of Fentanyl and
50 Grams or more of Actual
(Pure) Methamphetamine
(Count 1)

21 U.S.C. § 841(a)(1),
(b)(1)(B)(vi), 18 U.S.C. § 2
Possession with the Intent to
Distribute 40 Grams or more of
Fentanyl
(Counts 2, 3)

21 U.S.C. § 841(a)(1), (b)(1)(C),
18 U.S.C. § 2
Possession with the Intent to
Distribute Heroin
(Count 4)

21 U.S.C. § 841(a)(1),
(b)(1)(A)(vi), 18 U.S.C. § 2
Possession with the Intent to

Distribute 400 Grams or more of
Fentanyl
(Count 5)

21 U.S.C. § 841(a)(1),
(b)(1)(A)(viii), 18 U.S.C. § 2
Possession with the Intent to
Distribute 50 Grams or more of
Actual (Pure) Methamphetamine
(Count 6)

18 U.S.C. §§ 922(g)(1),
924(a)(2)
Felon in Possession of a Firearm
(Counts 7, 8)

18 U.S.C. § 924(d), 21 U.S.C. §
853, 28 U.S.C. § 2461
Forfeiture Allegations

COUNT 1

Beginning on a date unknown, but by December 2020, and continuing until
on or about April 13, 2021, in the Eastern District of Washington and elsewhere,
the Defendants, [REDACTED]
[REDACTED] JASMINE MARIE CAMPBELL (a/k/a “Lucas”), and other
individuals, both known and unknown to the Grand Jury, did knowingly and
intentionally combine, conspire, confederate and agree together with each other to
commit the following offense: distribution of 50 grams or more of actual (pure)
methamphetamine and 400 grams or more of a mixture or substance containing a
detectable amount of N-phenyl-N-[1-(2-phenylethyl)-4-piperidinyl] propanamide
(a/k/a “Fentanyl”), a Schedule II controlled substance, in violation of 21 U.S.C.
§§ 841(a)(1), (b)(1)(A)(viii) and (vi), 846.

COUNT 2

On or about December 13, 2020, in the Eastern District of Washington, the Defendant, [REDACTED], knowingly and intentionally possessed with intent to distribute 40 grams or more of a mixture or substance containing a detectable amount of N-phenyl-N-[1-(2-phenylethyl)-4-piperidinyl] propanamide (a/k/a "Fentanyl"), a Schedule II controlled substance, in violation of 21 U.S.C. § 841(a)(1), (b)(1)(B)(vi), and 18 U.S.C. § 2.

COUNT 3

On or about March 3, 2021, in the Eastern District of Washington, the Defendant, [REDACTED], knowingly and intentionally possessed with intent to distribute 40 grams or more of a mixture or substance containing a detectable amount of N-phenyl-N-[1-(2-phenylethyl)-4-piperidinyl] propanamide (a/k/a "Fentanyl"), a Schedule II controlled substance, in violation of 21 U.S.C. § 841(a)(1), (b)(1)(B)(vi), and 18 U.S.C. § 2.

COUNT 4

On or about March 3, 2021, in the Eastern District of Washington, the Defendant, [REDACTED], knowingly and intentionally possessed with intent to distribute a mixture or substance containing a detectable amount of heroin, a Schedule I controlled substance, in violation of 21 U.S.C. § 841(a)(1), (b)(1)(C) and 18 U.S.C. § 2.

COUNT 5

On or about March 3, 2021, in the Eastern District of Washington, the Defendant, [REDACTED], knowingly and intentionally possessed with intent to distribute 400 grams or more of a mixture or substance containing a detectable amount of N-phenyl-N-[1-(2-phenylethyl)-4-piperidinyl] propanamide (a/k/a "Fentanyl"), a Schedule II controlled substance, in violation of 21 U.S.C. § 841(a)(1), (b)(1)(A)(vi), and 18 U.S.C. § 2.

COUNT 6

On or about March 3, 2021, in the Eastern District of Washington, the Defendant, [REDACTED] knowingly and intentionally possessed with intent to distribute 50 grams or more of actual (pure) methamphetamine, a Schedule II controlled substance, in violation of 21 U.S.C. § 841(a)(1), (b)(1)(A)(viii), and 18 U.S.C. § 2.

COUNT 7

On or about March 3, 2021, in the Eastern District of Washington, the Defendant, [REDACTED], knowing of his status as a person previously convicted of a crime punishable by imprisonment for a term exceeding one year, did knowingly possess a firearm in and affecting commerce, to wit: a Springfield XDM .40 caliber pistol, bearing serial number MG141882, which firearm had theretofore been transported in interstate and/or foreign commerce, in violation of 18 U.S.C. §§ 922(g)(1), 924(a)(2).

COUNT 8

On or about March 3, 2021, in the Eastern District of Washington, the Defendant, [REDACTED], knowing of his status as a person previously convicted of a crime punishable by imprisonment for a term exceeding one year, did knowingly possess a firearm in and affecting commerce, to wit: a Ruger LCP .380 caliber pistol, bearing serial number 371903965, which firearm had theretofore been transported in interstate and/or foreign commerce, in violation of 18 U.S.C. §§ 922(g)(1), 924(a)(2).

NOTICE OF CRIMINAL FORFEITURE ALLEGATIONS

The allegations contained in this Superseding Indictment are hereby re-alleged and incorporated by reference for the purpose of alleging forfeitures.

Pursuant to 21 U.S.C. § 853, upon conviction of an offense of violation of 21 U.S.C. § 841, as charged in Counts 1 – 6 of this Superseding Indictment, the Defendants, [REDACTED] (Counts 1 – 4); [REDACTED] (Count 1);

1 [REDACTED] (Counts 1, 5, and 6); and, JASMINE CAMPBELL. (a/k/a
 2 “Lucas”) (Count 1), shall forfeit to the United States of America, any property
 3 constituting, or derived from, any proceeds obtained, directly or indirectly, as the result
 4 of such offense and any property used or intended to be used, in any manner or part, to
 5 commit or to facilitate the commission of the offense. The property to be forfeited
 6 includes, but is not limited to, the following listed assets:

7 Defendant [REDACTED]:

- 8 - a Springfield XDM .40 caliber pistol, bearing serial number
 9 MG141882 loaded with one round of .40 caliber ammunition; and,
 10 - Any and all seized ammunition and accessories, including:
 11 three (3) .40 caliber rounds of ammunition and a loaded magazine.
 12

13 Defendant [REDACTED]:

- 14 - \$8,942.00 U.S. currency; and,
 15 - a Ruger LCP .380 caliber pistol, bearing serial number 371903965.
 16 - any and all seized ammunition and accessories, including:
 17 Forty-nine (49) .380 rounds with a stamp of *I*;
 18 Forty (40) .380 rounds with a stamp of “Federal Auto”;
 19 Thirty-five (35) .380 rounds with a stamp of “Win Auto”; and,
 20 Twenty-six (26) .380 rounds with a stamp of “ACP Tulammo.
 21 all contained in a black case; and,
 22 Fifteen (15) loose rounds of .380 ammo stamped “Win Auto”; and,
 23 a loaded magazine.
 24

25 If any forfeitable property, as a result of any act or omission of the
 26 Defendants:

- 27 a. cannot be located upon the exercise of due diligence;
 28 b. has been transferred or sold to, or deposited with, a third party;
 c. has been placed beyond the jurisdiction of the court;
 d. has been substantially diminished in value; or

1 e. has been commingled with other property which cannot be divided
2 without difficulty,
3 the United States of America shall be entitled to forfeiture of substitute property
4 pursuant to 21 U.S.C. § 853(p).

5 Pursuant to 18 U.S.C. § 924(d)(1) and 28 U.S.C. § 2461(c), upon conviction
6 of an offense in violation of 18 U.S.C. §§ 922(g)(1), 924(a)(2), as set forth in
7 Counts 7 and 8 of this Superseding Indictment, Defendants, [REDACTED]
8 [REDACTED] shall forfeit to the United
9 States of America, any firearms and ammunition involved or used in the
10 commission of the offense, including, but not limited to:

11 [REDACTED]:

- 12 - a Springfield XDM .40 caliber pistol, bearing serial number
- 13 MG141882 loaded with one round of .40 caliber ammunition; and,
- 14 - any and all seized ammunition and accessories, including:
- 15 three (3) .40 caliber rounds of ammunition and a loaded magazine.

16 [REDACTED]:

- 17 - a Ruger LCP .380 caliber pistol, bearing serial number 371903965.
- 18 - a Ruger LCP .380 caliber pistol, bearing serial number 371903965.
- 19 - any and all seized ammunition and accessories, including:
- 20 Forty-nine (49) .380 rounds with a stamp of *I*;
- 21 Forty (40) .380 rounds with a stamp of “Federal Auto”;
- 22 Thirty-five (35) .380 rounds with a stamp of “Win Auto”; and,
- 23 Twenty-six (26) .380 rounds with a stamp of “ACP Tulammo.
- 24 all contained in a black case; and,

25 //

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1 Fifteen (15) loose rounds of .380 ammo stamped “Win Auto”; and,
2 a loaded magazine.

3 DATED this ____day of April 2021.

4 A TRUE BILL



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9 _____
10 Joseph H. Harrington
11 Acting United States Attorney

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13 Stephanie Van Marter
14 Assistant United States Attorney
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